

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ANDREW CHARLES HOY : CHAPTER 13  
Debtor :  
: :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
: :  
vs. :  
: :  
ANDREW CHARLES HOY :  
Respondent : CASE NO. 1-22-bk-00028

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 9th day of January, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
  - b. The plan is underfunded relative to claims to be paid. The plan needs to pay a total of approximately \$49,336.00 in order to be fully funded.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 9th day of January, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Kara Gendron, Esquire  
125 State Street  
Harrisburg, PA 17101

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee